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Kansas Department of Health and Environment
Bureau of Air and Radiation
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Compliance **Method 9 Compliance Testing Requirements** **Technical Guidance Document - BAR 2001-02**

Purpose: To outline the practices of the Bureau of Air and Radiation concerning the procedures for determining compliance with opacity standards found in K.A.R. 28-19-650, K.A.R. 28-19-720, and K.A.R. 28-19-750.

I. Reduced Observation Time Period

K.A.R. 28-19-720 adopts by reference 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS), and K.A.R. 28-19-750 adopts by reference 40 CFR Part 63 (MACT). 40 CFR 60.11 prescribes the method (Reference Method 9) to be used in most circumstances to determine initial compliance with the opacity standards contained in the individual Subparts of Part 60. For purposes of determining initial compliance under 40 CFR 60.11 and 40 CFR 63.6, the minimum total observation time is 3 hours (thirty 6-minute averages) for each affected emission point. This applies to sources where the Method 9 reading is performed in addition to stack testing, such as a hot mix asphalt plants (NSPS Subpart I), or to sources such as nonmetallic mineral processing plants (NSPS Subpart OOO), where the opacity readings constitute the entire initial performance test.

Sources With Alternative Performance Test Provisions (Rock Crushers):

Sources subject to NSPS subparts where alternative monitoring provisions have been established may use those methods to determine compliance with the initial opacity performance demonstration. An example is the nonmetallic mineral processing industry, which specifies limitations for reducing the 3-hour opacity observation period in sections 60.675(c)(2), 60.675(c)(3), and 60.675(c)(4).

Sources Without Alternative Initial Performance Test Provisions:

For sources subject to an opacity requirement where alternative performance test provisions have not been established, an emission point may be considered to have met the initial compliance demonstration if none of the 6-minute averages for opacity during the first hour of observation exceeds 25% of the opacity standard. For a source with an opacity limit of 20%, this would mean that none of the 6-minute readings would average greater than 5% opacity. Sources with opacity standards of 0% must comply with the requirements contained in that subpart (i.e., conduct the full 3-hour observation described in 40 CFR 60.11 or 40 CFR 63.6).

II. Multiple Emission Point Readings

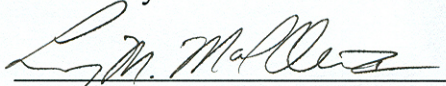
The Bureau of Air and Radiation will allow multiple point readings – no more than three at a time – during a Method 9 opacity evaluation if the points in question are located in such a manner that the observer can satisfy the physical conditions specified by the method. The KDHE reserves the right to limit an observer's options to conduct multiple (two or three) emission point observations at any one time, based on the observer's level of experience, or past performance history.

III. General Provisions

The Kansas Department of Health and Environment (KDHE) authorizes the above testing procedures when determining compliance with the opacity regulations at affected facilities subject to opacity performance testing requirements. When applying Method 9, the guidelines listed below must be followed:

1. Method 9 compliance testing shall be conducted by the owner or operator utilizing a qualified observer.
2. Facilities or equipment, for which Method 9 observations are being conducted, shall be operating at maximum production rates during the performance test. If the production rate significantly exceeds the production rate at which the facility performance test was conducted KDHE will require another performance test. A record of throughput production shall be kept during testing.
3. A written report shall be submitted to KDHE by the owner or operator and signed by the qualified observer stating the results of the compliance test. The report shall also contain a statement/certification from the smoke school which the qualified observer last attended acknowledging the observer is qualified pursuant to Section 3 of Method 9, and the date the observer was determined qualified. The qualified observer may be an employee of the owner or operator of the facility.
4. KDHE field staff may be present at the facility for a sufficient length of time to determine that the proposed compliance testing procedure complies with the regulatory requirements, to insure that the qualified observer understands the regulatory requirements, and to conduct preliminary opacity observations sufficient to aid the agency in determining whether the observations of the qualified observer are valid.

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